

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

HARRY ARMSTRONG,

Plaintiff,

vs.

CINCINNATI BELL TELEPHONE,

Defendant.

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: CASE NO.
: C-1-01-817
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:

DEPOSITION OF:

LAWRENCE COTTON

TAKEN:

By the Plaintiff
Pursuant to Agreement

DATE:

July 28, 2003

TIME:

Commencing at 1:00 p.m.

PLACE:

Offices of Frost Brown Todd
2200 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

BEFORE:

Nancy A. Burns
Notary Public - State of Ohio

ORIGINAL

1 A. I just remember pushing him out and trying to
2 resolve the situation.

3 Q. You pushed him out the door?

4 A. Yes.

5 MS. MORGAN: Just to be clear --

6 Q. You pushed Mr. Armstrong?

7 A. Yes.

8 Q. You were holding him back or just escorting him
9 out of the room?

10 A. I was trying to get him out the room.

11 Q. And were you saying anything when you were
12 taking him out of the room?

13 A. I don't remember.

14 Q. Were you trying to calm him down?

15 A. I was trying to resolve the situation before it
16 turned, you know, before it got any worse.

17 Q. Did you grab him by the arms or did you have to
18 wrestle him and carry him out, did you have to use any force
19 to take him out of the room?

20 A. Yeah. I pushed him by the arms.

21 Q. So you took him by the arms and just took him
22 out?

23 A. Well, I'm pretty strong so, you know, I'm just
24 strong, and I just pushed him out, it wasn't too hard for me
25 to get him out.

1 MR. DEARDORFF: I have no other questions.

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4 LAWRENCE COTTON

5 -- --
6 DEPOSITION CONCLUDED AT 1:30 p.m.
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1 MR. DEARDORFF: I have no other questions.

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5 -- --
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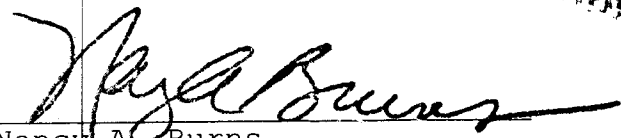
C E R T I F I C A T E

STATE OF OHIO :
: SS
COUNTY OF HAMILTON :

I, Nancy A. Burns, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do hereby certify that before the giving of his aforesaid deposition, LAWRENCE COTTON was by me first duly sworn to depose the truth, the whole truth and nothing but the truth; that the foregoing is the deposition given at said time and place by LAWRENCE COTTON; that said deposition was taken in all respects pursuant to stipulations of counsel hereinbefore set forth; that I am neither a relative of nor employee of any of their counsel, and have no interest whatever in the result of the action.

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office at Cincinnati, Ohio, this 23rd day of September, 2003.

My commission expires:
July 20, 2004.


Nancy A. Burns
Notary Public - State of Ohio

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